

## First Priority Life Insurance Company – Individual Plans

Rate request filing ID # 1A-DP-18-FPLIC (SERFF # HGHM-131475736) - This document is prepared by the insurance company submitting the rate filing as a consumer tool to help explain the rate filing. It is not intended to describe or include all factors or information considered in the review process. For more information, see the filing at <http://www.insurance.pa.gov/Consumers/ACARelatedFilings/>

### Overview

Initial requested average rate change:	8.6%
Revised requested average rate change:	6.9%
Range of requested rate change:	6.9% to 6.9%
Effective date:	January 1, 2019
People impacted:	111
Available in:	Rating Area 3

### Key information

#### Jan. 2017-Dec. 2017 financial experience

Premiums	\$4,013,162
Claims	\$5,764,163
Administrative expenses	\$1,032,456
Taxes & fees	\$671,041
Company made (after taxes)	<b>(\$3,454,498)</b>

#### How it plans to spend your premium

This is how the insurance company plans to spend the premium it collects in 2019:

Claims:	90%
Administrative:	8%
Taxes & fees:	2%
Profit:	0%

The company expects its annual medical costs to increase **8.5%**.

### Our decision

The company initially requested an average 8.6% rate change in the individual market for enrollees in current 2018 plans that continue coverage with the company in 2019. The statewide average rate increase request, across all companies, was originally 4.9% and was reduced to 0.7% as a result of changing the Cost Share Reduction (CSR) load from 28% to 20%. After other changes such as reducing profit and modifying the risk adjustment transfer amount, the final statewide average individual rate increase request, across all companies, is -2.3%

### Process and Considerations for the 2019 Plan Year

The Department instructed issuers to file requested rates for 2019 Affordable Care Act (ACA)-compliant plans assuming the individual mandate penalty would not be enforced and that the federal government would not make CSR payments. The requested changes assumed a multiplicative 6% morbidity load for these and other expected market changes proposed by the federal administration.

The individual mandate required individuals to maintain health insurance or pay a fee with their federal income tax. This incentivized healthier people to buy health insurance, which reduced costs for everyone. Without the individual mandate penalty, people may choose to buy insurance only if or when they're sick, which may cause premiums to be much higher than they have been.

Additionally, a 20% load for CSR defunding was applied to on-exchange silver plans. CSR payments are payments made by the federal government to insurers to reduce out-of-pocket costs, like deductibles and copayments, for low and middle-income enrollees. Although, the federal government has stopped making CSR payments, insurers are still required by federal law to reduce out-of-pocket costs for low and middle-income enrollees. As a result, the Department allowed insurers to include the 20% CSR defunding load on the exchange plans.

Examples of additional market changes impacting rates include the expansion of access to short-term limited duration plans and association health plans offered outside of the ACA markets. Both of these types of plans may provide less expensive coverage options that may not necessarily offer the full patient protections and benefits assured under the ACA. These policies could destabilize the ACA risk pool by enticing healthier risks into lower cost substandard coverage while leaving consumers who require more comprehensive health care in the ACA risk pool.

For each requested plan, the Department reviewed the contract to see if the plan included all of the benefits required by state and federal law, if the rates are reasonable in relation to the benefits, and if the company will be able to pay projected claims and expenses. The Department also considers factors such as the insurer's revenues, medical and administrative costs, actual and projected profits, and past rate changes, as well as the effect the change will have on Pennsylvania consumers.

In approving rates for 2019, the Department focused on making sure that Pennsylvanians in every county in the state continue to have access to health care coverage. Further, in 2019, the number of counties with just one health issuer offering coverage in the individual market has decreased from 2018. Ensuring that affordable options remain available to Pennsylvania consumers is a top priority for the Department.

The Department also required the company to reduce its medical trend. The average final rate change approved for this company is 6.90%.

Finally, the Insurance Department will launch an outreach and marketing campaign to make up for a lack of funding by the federal government for outreach during the 2019 open enrollment season. The Department continues to facilitate enrollment in the most appropriate plan through educational resources available at [www.insurance.pa.gov](http://www.insurance.pa.gov).

**General Note:** An insurer may not increase your rates more than once in a calendar year. The change in how much a specific individual or employer pays may vary from the average rate change shown in this summary due to plan-specific factors, like the benefit package and provider network used by the plan, and due to four factors specific to the individual or employer/employees: geographic location, age, tobacco use, and family size.

These premium rates are being set at a level that is required to adequately cover rising costs, primarily due to increasing medical and pharmacy services in the Individual market. The unanticipated financial gains realized in 2017, which followed three years of significant financial losses in this region, are not indicative of future performance.

## What we consider

Premium is made up of three parts: medical claims, administrative expenses, and profit or loss. We review all of the information in rate filings for individual and small group health plans, including the plans' medical claims, administrative expenses, and projected profit or loss.

A key component used to calculate projected claims is medical trend. Medical trend is the change in claims costs over a specific period of time—usually one to two years—and is often based on both the company's past claims costs and what they expect to spend on claims in the future.

Administrative expenses are any expenses not related to the cost of medical claims; including, but not limited to, employee salaries and benefits, the cost of the company's office and equipment, customer service, appeals costs, taxes, agent commissions, etc.

The company's projected profit (or contribution to surplus) is a small part of the premium. The reasonableness of the projected profit may depend on the company's current surplus level and other factors.

Federal law requires health insurance companies to have a medical loss ratio (MLR) of at least 80%. This means that your insurance company must spend at least 80% of your premium dollars on medical care and activities that improve the quality of care. If your insurance company spends less than 80% on medical care and quality improvement then the company must give you money back in the form of a rebate. A medical loss ratio of 80% indicates that the insurer is using the remaining 20 cents of each premium dollar for administrative costs and profits. The Department does not approve rates in this market that appear likely to result in an MLR of less than 80%.

## Glossary

**Annual rate change:** Companies normally file a rate change each year due to their medical claims experience. The annual rate request may or may not include benefit changes.

**Average rate change:** The average amount rates will change for all enrollees.

For individual health plans: How much your premium will change depends on your age, where you live, how many family members are covered on your plan, whether or not you or your family members smoke and which benefits you choose.

For small employer health plans: The employer's premium will vary based on their employees' age, the employer's location, their employee's family size, and the benefits they choose.

**Claims/Medical Costs:** What the health plan spends on direct medical services including hospital stays, providers, and prescription drugs.

**Individual Plans:** Insurance you buy from an insurance company for yourself and/or your dependents; not insurance you get from your employer.

**Premium:** Under federal law, insurance companies can take into account only four factors when varying your rate in order to set the premium costs you will be charged each month. These four factors are:

- Age: Older people can be charged up to 3 times more for premiums than younger people.
- Geographic location: Where you live has a big effect on your premiums. Competition, local regulation, and cost of living in different areas account for this.
- Tobacco Use: Insurers can charge tobacco users up to 50% more than those who don't use tobacco.
- Individual vs. family enrollment: Insurers can charge more for a plan that covers a spouse and/or dependents.

**Profit:** The amount of money remaining after the company's claims, administrative expenses, and taxes and fees are paid.

**Rate:** The rate is the base amount that an insurance company charges a person. An insurance company can increase the base rate depending on four factors in order to calculate the monthly premium that a consumer will be charged. See "Premium."

**Rating Area:** Federal law requires that each state have a set number of geographic areas that all insurance companies may use to adjust how much they charge consumers. When insurance companies calculate premiums, all enrollees within a rating area will have the same adjustment factor applied. Depending on the rating area you live in the prices you pay may be higher or

lower than the state average. Pennsylvania has 9 rating areas. (See the Pennsylvania Geographic Rating Area Map below.)

**Small Group Plans:** Small group plans are those sold to employers with 1-50 employees.

**Surplus:** An insurer's funds on hand for which the company has no corresponding liabilities. Insurers maintain a surplus so that they have sufficient funds to withstand adverse business conditions such as unexpectedly high medical claims or low enrollment, and in order to make investments in infrastructure and technology.

**Pennsylvania Geographic Rating Areas**

